

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

ANTHONY CARLTON DUNLAP, SR.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 17-03120
	)	
GREENE COUNTY JUSTICE	)	
CENTER, et al.	)	
	)	
Defendants.	)	

**DEFENDANT Lt. JENKINS' OBJECTIONS AND RESPONSES TO PLAINTIFF'S  
INTERROGATORIES OF OCTOBER 4, 2017**

COMES NOW Defendant Lt. Jenkins, by and through counsel Keck & Austin, LLC and submits the following objections and answers to Plaintiff's Interrogatories of October 4, 2017:

This Defendant has attached a copy of Plaintiff's Interrogatories of October 4, 2017, marked as Ex. 1, and incorporates those as if fully stated herein, in lieu of typing them.

This Defendant objects to the instruction portion of the interrogatories as being outside the scope of permissible discovery and not authorized by any Federal Rule of Civil Procedure. Further, this Defendant is under no obligation to affirmatively seek and obtain information solely to assist Plaintiff in litigation, and also cannot speculate as to what facts Plaintiff believes may be "relevant to the conduct described in these interrogatories." In further response to each enumerated Interrogatory:

1. I would have to refer to the records.
2. I would have to refer to the records.
3. I would have to refer to the records.
4. Objection, vague and calls for Defendant to speculate as to Plaintiff's meaning as to which cell transfer Plaintiff is referring to, and Plaintiff's intent regarding "penological interest." Further, assumes disputed facts, in that this Defendant was not involved in assigning Plaintiff to every cell assignment/suicide watch.
5. Objection. This interrogatory is vague and calls for Defendant to speculate as to Plaintiff's meaning as to which cell transfer Plaintiff is referring to, and Plaintiff's intent regarding "penological interest." Further, assumes disputed facts, in that this Defendant was not involved in assigning Plaintiff to every cell assignment/suicide watch.
6. Objection to "notify," and this interrogatory calls for Defendant to assume disputed facts. Plaintiff has claimed he suffers from various chronic ailments, but is certainly not "disabled."
7. If so, then that is probably a correct paraphrasing.

KECK & AUSTIN, L.L.C.

By /s/ Damon S. Phillips  
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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

ANTHONY CARLTON DUNLAP, SR.,

Plaintiff,

vs.

GREENE COUNTY JUSTICE  
CENTER, et al.

Defendants.

Case No. 17-03120

**DEFENDANT ATCHISON'S RESPONSES TO PLAINTIFF'S INTERROGATORIES OF  
NOVEMBER 6, 2017**

COMES NOW Defendant Atchison, by and through counsel Keck & Austin, LLC and submits the following answers to Plaintiff's Interrogatories of November 6, 2017:

This Defendant has attached a copy of Plaintiff's Interrogatories of November 6, 2017, marked as Ex. 1, and incorporates those as if fully stated herein, in lieu of typing them.

In further response to each enumerated Interrogatory:

1. I have no specific memory of being called to C-pod, but jail medical records document that I responded to C-pod and plaintiff's cell on that date.

2. I remember plaintiff claimed he fell, but otherwise would have to refer to the records.

3. I do not specifically recall.

4. I do not specifically recall.

5. I do not specifically recall.

6. I do not believe so, if there was an obvious injury or the assessment was not in normal limits, I would have.

7. I do not recall, but my documentation indicated he was in the process.
8. We do not distinguish between "boats" and "bottom bunks."
9. We only distinguish between to tier and lower tier.

KECK & AUSTIN, L.L.C.

By /s/ Damon S. Phillips

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Attorneys for Defendants

**CERTIFICATE OF MAILING**

The undersigned hereby certifies that a true and accurate copy of the foregoing Defendant Atchison's Responses to Plaintiff's Interrogatories of November 6, 2017 was forwarded to plaintiff by U.S. First Class postage pre-paid, this 14<sup>th</sup> day of November, 2017 to:

Anthony Carlton Dunlap, Sr. #2958346  
Greene County Justice Center  
1000 N. Boonville  
Springfield, MO 65802

/s/ Damon S. Phillips

Damon S. Phillips

GREENE COUNTY JUSTICE CENTER  
1000 N Boonville  
Springfield MO. 65802

Inmate Name  
Anthony C. Dunlap SR.

Jacket #  
2958346

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
400 E. 4th St,  
Kansas City, MO 64106

INDIGENT